

REMARKS

Claims 1-20, all the claims pending in the application, remain rejected on prior art grounds.

Claim Rejections - 35 U.S.C. § 102(e)

The Examiner has maintained the rejection of claims 1, 3-4, 6, 10-11, 13-15, and 20 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Application Publication No. 2002/0107973 to Lennon et al. (hereinafter "Lennon"). Applicants traverse the rejection at least for the following reasons.

In the Response filed February 15, 2008, Applicants argued that Lennon does not teach an apparatus which includes both the alleged mapping module 212 which receives and converts external digital content metadata and the alleged search module 101 which accesses a program in the received external digital content metadata. Instead, Lennon discloses that the metadata server 212 is preferably located at the site of the metadata and controlled by the owner thereof (paragraph 72), while the media browser 101 belongs to a local computer 105 which may acquire access to the metadata server 212 via the internet (paragraph 66 and Fig. 2).

In the Office Action, the Examiner responds by asserting a new interpretation of the claimed apparatus. In particular, the Examiner contends that the user terminal including the media browser 101, the metadata server 212, the database manager 211, and the legacy database 210 collectively correspond to the claimed apparatus. Even under the Examiner's new interpretation, Applicants submit that Lennon does not teach all of the features of independent claims 1, 4, 11, 14, and 15.

Lennon discloses that access to metadata is achieved using a link which is actuated automatically by the media browser 101 or in response to a user action (paragraph 71). If the

metadata is stored in an XML repository 200, the link is used to retrieve the metadata as an XML description of corresponding content (paragraph 72). If the metadata does not conform to the XML schema, the metadata is stored in a legacy database 210 (paragraph 73). In such a case, the link is used to retrieve the metadata from the legacy database 210 via a metadata server 212 which translates the metadata to an XML description. The corresponding content is retrieved from content collection 214 using a link provided in the XML description.

On page 2 of the Office Action, the Examiner asserts that Lennon teaches receiving a description of an item of multi-media content (from legacy database 210) and converting it into XML form (by metadata server 212). The Examiner thus concludes that the claimed converting received external digital content metadata into digital content metadata peculiar to the network is taught. However, under the Examiner's new interpretation, both metadata server 212 and legacy database 210 are part of the claimed apparatus. Accordingly, the description of an item of multi-media content received from legacy database 210 is not external digital content metadata. Thus, Lennon does not teach converting received external digital content metadata into digital content metadata peculiar to a network, as recited, in some variation, by independent claims 1, 4, 11, 14, and 15. Instead, Lennon teaches that metadata which is stored internally in the alleged apparatus is converted. The only external information received by any of media browser 101, metadata server 212, database manager 211, and legacy database 210 is the link which identifies the metadata. This link clearly does not qualify as digital content metadata.

Because Lennon does not teach all of the features of independent claims 1, 4, 11, 14, and 15, Applicants submit that the claims are not anticipated by Lennon. Applicants also submit that claims 3, 6, 10, 13, and 20, being dependent on one of claims 4, 11, 14, and 15, are patentable at least by virtue of their dependency.

Claim Rejections - 35 U.S.C. § 103(a)

The Examiner has maintained the rejection of claims 2, 7-9, 12, and 17-19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lennon in view of Applicant's alleged admitted prior art (hereinafter "APA"). Because these claims are dependent on one of claims 1, 4, 11, 14, and 15, and because APA does not cure the deficiencies of Lennon, Applicants submit that the claims are patentable at least by virtue of their dependency.

The Examiner has rejected claims 5 and 16 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lennon in view of U.S. Patent Application Publication No. 2002/0199188 to Sie et al. (hereinafter "Sie"). Because these claims are dependent on one of claims 4 and 15, and because Sie does not cure the deficiencies of Lennon, Applicants submit that the claims are patentable at least by virtue of their dependency.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

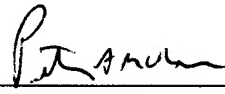
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